



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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Irwin Levin, Treasurer  
L A PAC  
8665 Wilshire Boulevard, Suite 220  
Beverly Hills, CA 90211

Identification Number: C00095059

AUG 16 2000

Reference: Year End Report (12/01/99-12/31/99)

Dear Mr. Levin:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The totals listed on Lines 7, 21(b), 21(c), 30, and 31, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Your report disclosed certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. Contributions to federal candidates should be properly disclosed on a separate Schedule(s) B, supporting Line(s) 23 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

-Please amend Schedule B supporting Line 23 by providing the office sought including state and congressional district, if applicable, for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-Your report discloses a contribution to Citizens for Rush on a Schedule B supporting Line 29 of the Detailed Summary Page. Please note, a contribution to Citizens for Rush made on the same date and for the same

amount also appears on a Schedule B supporting Line 21(b) of the Detailed Summary Page. Please clarify whether or not these are two separate contributions. For future reporting, contributions made to federal candidates and political committees should be itemized on a separate Schedule B supporting line 23 of the Detailed Summary Page. Contributions made to non-federal candidates and committees should be itemized on Schedule B supporting Line 29. Please amend your report to clarify this discrepancy.

-Your report discloses no payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B, supporting Line(s) 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports

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Analysis Division). My local number is (202) 694-1130.

Sincerely,

*Thomas F. Maxwell, III*

Thomas F. Maxwell, III  
Reports Analyst  
Reports Analysis Division

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